



April 5, 2012

Kathleen Baskin, P.E.  
Director of Water Policy & Planning  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street, 9<sup>th</sup> Floor  
Boston, MA 02114

Re: Sustainable Water Management Initiative Framework

Dear Ms. Baskin:

The following are the comments of the Mystic River Watershed Association (MyRWA) on the Sustainable Water Management Initiative (SWMI) Framework. MyRWA appreciates this opportunity to comment on the SWMI Framework proposal released on February 3, 2012. The Mystic River Watershed Association is an organization whose mission is to restore clean water in the Mystic River watershed and to protect water quality and related natural resources within the watershed. We appreciate the hard work and effort that the EOEEA and other agencies of the commonwealth have put into drafting this proposed framework.

The Mystic River Watershed is unique in Massachusetts as the most urban watershed in the commonwealth. Most drinking water supplied to Mystic River communities is provided by the Massachusetts Water Resources Authority (MWRA) from the Quabbin and other regional reservoirs. However, even the Mystic is not immune from the impacts of the SWMI proposal. There are water withdrawals in the Mystic watershed. Those withdrawals are particularly focused on the Aberjona River near the headwaters of the watershed, but still have a substantial impact on flow. The safe yield methodology within the SWMI framework used to gauge the impact of water withdrawals does not take into account the disproportionate impact on the Aberjona River, and therefore on the Mystic River, that these withdrawals produce.

The safe yield methodology used within the SWMI framework is not safe for the rivers in the commonwealth because it results in inaccurate, excessive safe yield values that will undermine the ecological health of rivers and streams which these methodologies are intended to protect.

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Here are several specific concerns:

- The methodology ignores that less water than the “safe yield” is available to be withdrawn in the summertime or other times of drought. This is especially troublesome when the time of low water is also the period of highest water demand. Using EEA guidelines, if the safe yield was withdrawn at times of drought, the rivers of the commonwealth would run dry. Those not dried out would be degraded to the point of being classified as Category 5, severely degraded. Unfortunately, nothing in the SWMI requires action when flows fall below safe levels.
- The SWMI guidelines will allow excessive withdrawals from areas with insufficient hydrologic capacity. This is a particularly vexing problem in the Mystic River watershed because as an urban watershed it is built up, densely populated and much of the watershed is covered with impervious surfaces. This could be addressed by safe yield on a square-mile basis that takes into consideration the unique circumstances of the individual watersheds, and by explicitly stating when safe yield is exceeded in a flow-depleted sub-basin such as the Mystic.
- The reservoir credit is based on reservoir storage capacity without regard to the impacts of capturing and storing the annual flow on the river. The credit is higher than 100% of the annualized drought flow in most cases, which does not leave any water for the river. Allowing such a large storage credit, in addition to the high safe yield withdrawal values, is inconsistent with reserving environmental flows in rivers and protecting the ecological health of those rivers.
- The proposed SWMI guidelines result in excessive withdrawals that are counter to sustainable water management and should be abandoned. What is needed is an objective peer-reviewed process, which is not what we have in this proposed framework.

What the commonwealth needs are stream flow standards which identify the limits of acceptable flow alteration. We have identified how much water is required for a healthy river fish community. We also understand that it is the relative abundance of fluvial fish that are an indicator of aquatic habitat quality. Here at MyRWA we are concerned about the impact excessive withdrawals will have on our fish community, especially river herring fry. The proposed standards do not establish minimum “hands-off flows” that must stay in the river to sustain its ecosystem, and do not prevent “backsliding” or require specific action when flows fall below critical thresholds. The SWMI criteria as proposed will not prevent rivers, streams or wetlands from falling below safe levels, or from being pumped dry. This is wholly unacceptable, and must be remedied.

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The SWMI process represents an important attempt to create a safe yield of water from both surface and ground water while maintaining a safe, ecologically sound flow in our surface waters. This is a once in a lifetime opportunity to address serious environmental issues, and establish safe yield limits that protect the ecological values of rivers and streams, consistent with the latest research.

The argument often used against efforts to preserve stream flow and habitat values in rivers in the commonwealth is that the cost of drinking water will increase. There is substantial evidence that clean water and a healthy local natural environment are very high priorities for a majority of Massachusetts residents. A marginal increase in the cost of fresh water will, in our opinion, be deemed money well spent if those funds are directed to river conservation.

Thank you very much for the opportunity to comment on the proposed SWMI framework.

Very truly yours,  
Mystic River Watershed Association

A handwritten signature in dark ink, featuring a stylized 'E' and 'K' followed by a long horizontal stroke.

EkOngKar Singh Khalsa  
Executive Director

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